

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ZIPWALL, LLC

Plaintiff,

v.

C&S MANUFACTURING, INC.

Defendant,

CIVIL ACTION

No. 04-cv-10079

MOTION TO ADMIT LEE F. GROSSMAN, ERIC P. MARTIN, & JEFFREY M. DRAKE
PRO HAC VICE

Now comes Tina M. Traficanti, counsel of record for the Plaintiff, and a member in good standing of the bar of the United States District Court for the District of Massachusetts and of the Massachusetts Supreme Judicial Court, and respectfully requests this Court to admit Lee F. Grossman, Esq., Eric P. Martin, Esq., and Jeffrey M. Drake, Esq. *pro hac vice* in this matter. In support of this Motion, Attorney Traficanti states as follows:

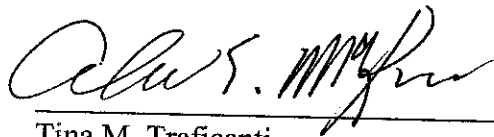
1. Attorney Grossman is an attorney practicing with the law firm of Grossman & Flight, LLC located at 20 North Wacker Drive, Suite 4220, Chicago, IL 60606.
2. Attorney Grossman is admitted to practice in the highest court of the state of Illinois and in the following Federal Courts: The Northern District of Illinois and The United States Court of Appeals for the Federal Circuit.
3. Attorney Grossman is a member of the bar in good standing of every jurisdiction where he has been admitted to practice.
4. There are no disciplinary proceedings pending against Attorney Grossman as a member of the bar of any jurisdiction.

5. Attorney Grossman is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
6. Attorney Martin is an attorney practicing with the law firm of Grossman & Flight, LLC located at 20 North Wacker Drive, Suite 4220, Chicago, IL 60606.
7. Attorney Martin is admitted to practice in the highest court of the state of Illinois and in the following Federal Courts: The Northern and Central Districts of Illinois, The Eastern District of Wisconsin, The Seventh Circuit Court of Appeals, and The Court of Appeals for the Federal Circuit.
8. Attorney Martin is a member of the bar in good standing of every jurisdiction where he has been admitted to practice.
9. There are no disciplinary proceedings pending against Attorney Martin as a member of the bar of any jurisdiction.
10. Attorney Martin is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
11. Attorney Drake is an attorney practicing with the law firm of Grossman & Flight, LLC located at 20 North Wacker Drive, Suite 4220, Chicago, IL 60606.
12. Attorney Drake is admitted to practice in the highest court of the state of Illinois and in the following Federal Court: The Northern District of Illinois.
13. Attorney Drake is a member of the bar in good standing of every jurisdiction where he has been admitted to practice.
14. There are no disciplinary proceedings pending against Attorney Drake as a member of the bar of any jurisdiction.
15. Attorney Drake is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

In further support of this Motion, Attorney Traficanti submits the accompanying Affidavits of Lee F. Grossman, Eric P. Martin, and Jeffrey M. Drake, attached hereto as Exhibits A, B, and C, respectively.

WHEREFORE, Attorney Traficanti respectfully requests that this Court allow this Motion in its entirety.

Respectfully Submitted,



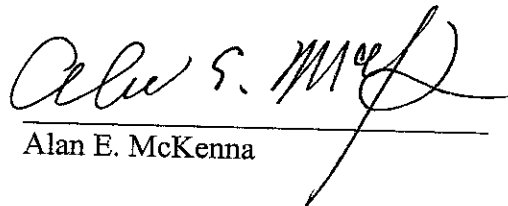
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Attorneys for Defendant,
C&S MANUFACTURING, INC.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Pro Hac Vice Motion has been served via U.S. First Class Mail, postage pre-paid, on March 25, 2004, to:

Aaron W. Moore
Matthew B. Lowrie
Lowrie, Lando & Anastasi, LLP
Riverfront Office Park
One Main Street
Cambridge, MA 02142
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Alan E. McKenna